

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

IN RE:

Rebecca M. Longstreath

Debtor

* Case No. 21-31384

* Chapter 7 (Judge Humphrey)

*

* **MOTION TO CONTINUE THE**

* **AUTOMATIC STAY AND NOTICE**

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Now comes the Debtor, by and through her undersigned Counsel, and moves the Court for an order continuing the automatic stay in the above captioned case past the initial thirty (30) day period after the filing of the Debtor's Petition pursuant to 11 U.S.C. Section 362 (c)(3)(B).

The Debtor had one prior case pending within the one year period immediately prior to the filing of the current case and therefore the automatic stay will expire thirty (30) days after the filing of the current case unless extended by the Court.

The Debtor appears to qualify for a Chapter 7 Discharge on all their dischargeable debts and appear to have filed in good faith. Therefore, the court should continue the Automatic Stay until the discharge is issued.

WHEREFORE, Debtor respectfully moves the court for an order continuing the automatic stay in the above captioned case past the initial thirty (30) day period after the filing of the Debtors' Petition pursuant to 11 U.S.C. Section 362(c)(3)(B).

Respectfully submitted,

/s/ Andrew J. Zeigler

Andrew J. Zeigler, #0081417

Attorney for Debtor

1340 Woodman Drive

Dayton, Ohio 45432

(937) 252-2030

(937) 252-9425 (FAX)

Email: andrew@kzlawohio.com

**NOTICE OF MOTION
TWENTY-ONE (21) DAY NOTICE**

Andrew J. Zeigler, Attorney for the Debtor has filed a Motion to Continue the Automatic Stay.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the Court to grant the relief sought in the Motion, then on or before twenty-one days from the date set forth in the certificate of service for the Motion, you must file with the Court a response explaining your position by mailing your response by regular U.S. Mail, to Clerk, US Bankruptcy Court, Southern District of Ohio, 120 W. Third Street, Dayton, Ohio 45402 OR your attorney must file a response using the Court's ECF System.

The Court must receive your response on or before the above date.

You must also send a copy of your response either by 1) the Court's ECF System or by 2) regular U.S. Mail, addressed to:

**Paul Spaeth, 7925 Paragon Road, Suite 101, Dayton, Ohio 45459
Andrew J. Zeigler, Attorney for Debtor, 1340 Woodman Drive, Dayton, Ohio 45432
Rebecca M. Longstreath, 1508 S. Longview Street, Beavercreek, Ohio 45432
Office of the U.S. Trustee, 170 North High Street, Suite 200, Columbus, Ohio 43215**

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion and may enter an order granting the relief sought without further hearing or notice.

All parties are hereby placed on notice that any objection to the MOTION TO CONTINUE THE AUTOMATIC STAY must be filed within twenty-one (21) days of the date set forth on the Certificate of Service or an order will be submitted to the Court granting the MOTION TO CONTINUE THE AUTOMATIC STAY. If a response objection to this MOTION TO CONTINUE THE AUTOMATIC STAY is timely filed, then this matter shall be set for hearing by the Court and said hearing date and time will be noticed by the Court.

**/s/ Andrew J. Zeigler
Andrew J. Zeigler, #0081417
Attorney for Debtor
1340 Woodman Drive
Dayton, Ohio 45432
(937) 252-2030**

CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2021 a copy of the foregoing Motion to Continue the Automatic Stay was served on the following registered ECF participants, electronically through the court's ECF System at the email address registered with the court.

Paul Spaeth, Trustee
U.S. Trustee

And on the following by ordinary U.S. Mail, postage prepaid, on August 18, 2021 addressed to:

Rebecca M. Longstreath, 1508 S. Longview Street, Beavercreek, Ohio 45432

All Creditors and Interested Parties as shown on attached matrix.

/s/ Andrew J. Zeigler
Andrew J. Zeigler

Label Matrix for local noticing
0648-3
Case 3:21-bk-31384
Southern District of Ohio
Dayton
Wed Aug 18 15:18:19 EDT 2021
Greene County Treasurer
PO Box 427
Xenia, OH 45385-0427

AFNI Inc
PO Box 3068
Bloomington, IL 61702-3068

Asst US Trustee (Day)
Office of the US Trustee
170 North High Street
Suite 200
Columbus, OH 43215-2417

Rebecca M. Longstreath
1508 S. Longview Street
Beavercreek, OH 45432-2913

Navient
PO Box 9500
Wilkes Barre, PA 18773-9500

Ohio Bureau of Motor Vehicles
Attn: Compliance Unit
PO Box 16583
Columbus, OH 43216-6583

Rosario Devito
Ten Larkfield Road
East Northport, NY 11731-1802

(p) SN SERVICING CORPORATION
323 FIFTH ST
EUREKA CA 95501-0305

Paul Spaeth
7925 Paragon Road
Suite 101
Dayton, OH 45459-4092

State of Ohio
Ohio Atty General, Bankruptcy Div
150 E. Gay Street, 21st Floor
Columbus, OH 43215-3191

Thomas George Associates, LTD
Insurance Recovery Division
PO Box 30
East Northport, NY 11731-0030

Travelers Insurance
PO Box 660339
Dallas, TX 75266-0339

US Bank Trust National Assn
c/o SN Servicing Corp
323 5th Street
Eureka, CA 95501-0305

USAA
Subrogation Department
PO Box 659476
San Antonio, TX 78265-9476

Wilbur & Associates
210 Landmark Drive
Normal, Illinois 61761-2119

Andrew Zeigler
Kennel Zeigler LLC
1340 Woodman Drive
Dayton, OH 45432-3495

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

SN Servicing Corporation
323 5th Street
Eureka, CA 95501

End of Label Matrix	
Mailable recipients	16
Bypassed recipients	0
Total	16